

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

SureFunding, LLC,

Debtor.

Chapter 11

Case No. 20-10953 (LSS)

**SUPPLEMENTAL VERIFIED STATEMENT PURSUANT TO RULE 2019
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Pursuant to Rule 2019(d) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the law firm of Blank Rome LLP (“Blank Rome”) hereby files this supplement (this “Supplemental Statement”) to its *Verified Statement Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure* [Docket No. 16] (the “Rule 2019 Statement”).

1. The disclosures and attachments provided in the Rule 2019 Statement are incorporated by reference, except as modified herein.

2. The Noteholders are currently comprised of Brett Hatton, an individual; Autumn Wind Global Multi-Strategies Fund, LP, a Delaware Limited Partnership; Damon Gersh, an individual; Jason Eckenroth, an individual; Sherri R. Sands, as trustee of the Sherri R. Sands Revocable Trust, a Florida Trust; Glickfield Capital Management, LLC fbo M. Glickfield Dynasty Trust, a Maryland Trust; Glickfield Capital Management, LLC fbo Cheryl Newmark, a Maryland Trust; Glickfield Capital Management, LLC fbo Marla Schram, a Maryland Trust; Carrickfergus Investments Limited, a British Virgin Islands Company; Stephane Carnot, as Trustee of the Carnot Family Trust, a District of Columbia Trust; Dorsey and Whitney Trust Co., LLC, as Trustee of the Dylan Taylor 2011 Grantor Trust, a South Dakota Trust; Matthew Briggs, as Trustee of the Briggs Management Trust; Michael Rubenstein, an individual; June Farmer, an individual; Thomas Carl

Myers, an individual; Richard L. Rogers, an individual; Neal J. Glickfield, as Trustee of the Neal J. Glickfield 2018 Trust, a Maryland Trust; Lineage, LLC, a Virginia Limited Liability Company; Brian Gray, an individual; HFJ Investments I, LLC, a Texas Limited Liability Company; Patricia B. Jones, as Trustee of the Patricia B. Jones Revocable Trust, a Maryland Trust; John B. Shaw as Trustee of the John B. Shaw 2012 Family Grantor Trust; JJK-3 Holdings, LLC; and Equity Trust Company, Custodian FBO Michele Rogers 200164710 IRA Rick & Michele Rogers (collectively, the “Noteholders”) in the above-captioned Chapter 11 Case.

3. As of the date of this Supplemental Statement, Blank Rome only represents the Noteholders in the Chapter 11 Case.

4. As of the date of this Supplemental Statement, the Noteholders are the only creditors or other parties in interest in the Chapter 11 Case for which Blank Rome is required to file a Verified Statement pursuant to Rule 2019.

5. Nothing contained in this Supplemental Statement is intended or shall be construed to constitute (i) a waiver or release of the rights of the Noteholders to have any final order entered by, or other exercise of the judicial power of the United States performed by, an Article III court; (ii) a waiver or release of the rights of the Noteholders to have any final orders in any non-core matters entered only after de novo review by a United States District Judge; (iii) consent to the jurisdiction of the Court over any matter; (iv) an election of remedy; (v) a waiver or release of any rights the Noteholders may have to a jury trial; (vi) a waiver or release of the right to move to withdraw the reference with respect to any matter or proceeding that may be commenced in the Chapter 11 Case against or otherwise involving the Noteholders; or (vii) a waiver or release of any other rights, claims, actions, defenses, setoffs or recoupments to which the Noteholders may be

entitled, in law or in equity, under any agreement or otherwise, with all of which rights, claims, actions, defenses, setoffs or recoupments being expressly reserved.

6. Blank Rome reserves the right to amend or supplement this Supplemental Statement in accordance with the requirements of Bankruptcy Rule 2019.

Dated: February 22, 2023
Wilmington, Delaware

BLANK ROME LLP

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